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Attorneys for Plaintiffs
BELLAGIO, LLC and
MIRAGE RESORTS, INC.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BELLAGIO, LLC, a Nevada limited liability
company, and MIRAGE RESORTS,
INCORPORATED, a Nevada corporation,

Plaintiffs,

v.

BELLAGIO SHOES, INC., a California
corporation, REBECCA RONEN, an individual,
and BERTINI SHOES, INC., a California
corporation,

Defendants.

Case No. 2:11-cv-01975-RFB-PAL

**STIPULATION AND ORDER TO STAY
DISCOVERY FOR 60 DAYS PENDING
SETTLEMENT DISCUSSIONS**

Plaintiffs Bellagio, LLC and Mirage Resorts, Incorporated (“MRI”), together referred to herein as “Plaintiffs” or “Bellagio,” and Defendants Bellagio Shoes, Inc., Rebecca Ronen, and Bertini Shoes, Inc. (together, “Defendants”) state the following:

1. Discovery in this action is scheduled to end on May 18, 2016. (*See* ECF No. 52 at p. 3, ll. 21-24.)

2. The parties, by and through their respective counsel, have been engaged in good faith settlement negotiations.

3. The parties believe that they are close to reaching agreement on the principal terms

1 of a settlement.

2 4. To facilitate settlement while still preserving their ability to litigate this matter
3 should the case not settle, the parties agree to stay discovery for a period of sixty (60) days from
4 the date this stipulation is filed so that they may settle this action and draft and execute a written
5 settlement agreement. Upon the expiration of the stay, if the case has not settled, the parties shall,
6 within fourteen (14) days of the expiration of the stay, submit an amended discovery plan and
7 scheduling order for the Court's approval.

8 **IT IS SO AGREED AND STIPULATED:**

9 LEWIS ROCA ROTHGERBER
10 CHRISTIE LLP

GEORGE B. HIBBELER, ESQ.

11 By: /s/ Jonathan W. Fountain
12 Michael J. McCue (NV Bar No. 6055)
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By: /s/ George B. Hibbeler III
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16 Attorneys for Plaintiffs
17 BELLAGIO, LLC and
18 MIRAGE RESORTS, INC.

Attorneys for Defendants
BELLAGIO SHOES, INC.
BERTINI SHOES, INC. and
REBECCA RONEN

19 **IT IS SO ORDERED:**

20 
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: _ April 6, 2016 _____
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Lewis Roca
ROTHGERBER CHRISTIE

CERTIFICATE OF SERVICE

I, Jonathan W. Fountain, hereby certify that on March 31, 2016, I filed a copy of the foregoing paper entitled, **STIPULATION AND ORDER TO STAY DISCOVERY FOR 60 DAYS PENDING SETTLEMENT DISCUSSIONS**, with the Clerk of the Court via the Court's CM/ECF system, which will send electronic notice to the following CM/ECF participants:

George B. Hibbeler, III, Esq.
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871 Coronado Center Dr., Suite 200
Henderson, NV 89012

I hereby further certify that there are no non-CM/ECF participants who have appeared in this action upon whom service of a paper copy is required.

Dated: this 31st day of March, 2016.

/s/ Jonathan W. Fountain
An employee of Lewis Roca
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